



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-3912

Refer to: L1631210001 -- St. Clair County
Sauget Municipal Landfill (Site Q) - Sauget
Superfund/Technical Reports

October 15, 1997

Mr. Daniel Chamberlin
ATC Associates, Inc.
8233 Brentwood Industrial Drive
St. Louis, Missouri 63144

Dear Mr. Chamberlin:

Bruce Yurdin and myself have had the opportunity to review your submittal to Illinois EPA dated September 2, 1997. I understand that this submittal essentially lays the groundwork for a workplan that will eventually be reviewed by the Agency pursuant to a Section 401 Water Quality Certification Permit application that will be prepared by your firm, if needed.

Most of what I could say about this document has already been stated at our meeting at the site last August and some of the concerns that were raised then have been incorporated into your submittal. These concerns relate to how Illinois EPA's Superfund program will perceive your proposed action as well as how these actions will not necessarily satisfy the proposal for settlement requirements outlined in Illinois Environmental Protection Agency vs. Paul Sauget, Sauget and Company, Eagle Marine Industries, Inc. and River Port Fleeting, Inc. (ILPCB 77-84).

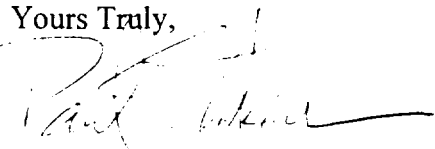
Illinois EPA is anticipating to list the former Sauget landfill (Site Q) as part of the Sauget Area 2 Sites on the NPL in the future. As part of an upcoming Remedial Investigation (RI), the nature and extent of contamination at the entire landfill (inclusive of the proposed filling area) will be characterized. These investigations will likely include a rather extensive soil boring program at the landfill. In the proposed filling area, it is anticipated that three or four soil borings may be necessary to verify the absence of contamination. Your schedule for filling activities indicates that the proposed area will be filled by the time the listing is finalized and the RI initiated.

With regard to the standing Pollution Control Board order, it cannot be construed that the placement of demolition debris will meet State ARARs with respect to final landfill closure requirements. Furthermore, I must add that a remedy for the landfill selected under Superfund may also be more stringent than Illinois' municipal landfill closure standards. This remedy to be

determined later will be based on the results of the Sauget Area 2 Sites RI.

Please let me know if you have any questions about this correspondence or the demolition debris disposal regulations I sent you a few days ago.

Yours Truly,

A handwritten signature in black ink, appearing to read "Paul E. Takács", written over a horizontal line.

Paul E. Takács, Project Manager
National Priorities Unit
Division of Remediation Management
Bureau of Land

cc: Bruce Yurdin
Todd Rettig
Jim Morgan, IAGO
Terry Ayers
Karon Marzec, USACE
Leah Evison, USEPA
Division File